

**IN THE UNITED STATES BANKRUPTCY COURT  
MIDDLE DISTRICT OF PENNSYLVANIA**

In re: **BRIAN J. RUPPERT and** : **5:17-bk-00149-JJT**  
**ELIZABETH J. RUPPERT,** : Chapter 13  
 :  
Debtors. :

**OBJECTION TO CONFIRMATION OF PLAN  
FILED BY PENN ESTATES PROPERTY OWNERS ASSOCIATION. INC.**

Now comes Penn Estates Property Owners Association, Inc. (the “Association”) and objects to confirmation of the above Debtors’ 4<sup>th</sup> Amended Chapter 13 plan, and in support thereof avers:

1. The plan cannot be confirmed since it fails to comply with 11 U.S.C. §1322, 11 U.S.C. §1325(a)(1), 11 U.S.C. §1325(a)(5)(B), L.B.R. 3015-2 and 3015-3, for the reason that the Debtors have failed to properly taken into consideration the Association’s secured claim.
2. The Association has a security interest in the amount of \$1,415.00 in Debtors’ real property in the Penn Estates planned community, Monroe County, PA. Said statutory lien was created pursuant to the Uniform Planned Community Act, 68 Pa.C.S.A. § 5315.
3. Debtors’ plan does not address the Association’s secured claim.

WHEREFORE, the Plan should be amended to include the full amount of the Association’s claim.

YOUNG & HAROS, LLC

/s/ NICHOLAS CHARLES HAROS, ESQ

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